

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Jane Doe,

Plaintiff,

v.

Villanova University, et al.,

Defendants.

Case No. 2:25-cv-03350-MRP

Electronically Filed

**JOINT MOTION FOR AN EXTENSION OF TIME
FOR DEFENDANT TO RESPOND TO COMPLAINT**

Plaintiff “Jane Doe” (“Plaintiff”) and Defendant Villanova University (“Defendant”), by and through their undersigned counsel, respectfully submit this Joint Motion for an Extension of Time for Defendant to Respond to Complaint, and in support thereof aver as follows:

1. Plaintiff filed a “Civil Action Complaint” in the Court of Common Pleas of Philadelphia County, Pennsylvania, Case ID. No. 250603095, on June 26, 2025 (ECF 1, Ex. A).
2. On June 27, 2025, Defendant filed a Notice of Removal (ECF 1).
3. Defendant must respond to the Complaint by July 18, 2025.
4. Defendant requests an extension of time to respond to Plaintiff’s Complaint, until August 11, 2025.
5. Plaintiff does not object to Defendant’s request for an extension of time, until August 11, 2025, to file its response to Plaintiff’s Complaint.
6. Defendant has agreed to waive service of Plaintiff’s Complaint and will file a waiver of service shortly.

WHEREFORE, the parties respectfully request that the Court grant this Motion and enter an Order granting an extension of the time for Defendant to respond until August 11, 2025.

Dated: July 18, 2025

Respectfully submitted,

/s/ James A. Keller

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of Pennsylvania by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ James A. Keller
James A. Keller, Esquire

Dated: July 18, 2025

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ORDER

AND NOW, this _____ day of July, 2025, upon consideration of Plaintiff and Defendant Villanova University's Joint Motion for an Extension of Time for Defendant to Respond to Complaint, **IT IS HEREBY ORDERED** that the Motion is **GRANTED**. Defendant's deadline to respond to the Complaint shall be extended to August 11, 2025.

BY THE COURT

Hon. Mia Roberts Perez
United States District Judge